

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND
NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR
A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE, AND OPERATION
OF A TELECOMMUNICATIONS FACILITY AT 60 VALE
ROAD, TOWN OF NEW BROOKFIELD, CONNECTICUT

DOCKET NO. 512

October 26, 2022

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC (AT&T)
PRE-HEARING SUBMISSION

Homeland Towers, LLC and AT&T (the “Applicants”) respectfully submit the following pre-hearing information available at this time regarding the above-referenced Application.

I. List of Witnesses

1. Raymond Vergati, Regional Manager, Homeland Towers LLC
2. Harry Carey, Director, External Affairs, AT&T
3. Robert Burns, P.E., Project Manager, All Points Technology Corp. P.C.
4. Dean Gustafson, Professional Soil Scientist & Senior Wetland Scientist, All Points Technology Corp, P.C.
5. Brian Gaudet, Project Manager, All Points Technology Corp. P.C.
6. Martin Lavin, Radio Frequency Engineer, C² Systems on behalf of AT&T
7. Paul H. Zito, Owner, New England Radio Consultants, LLC, emergency communications consultant for the Town of Brookfield (resume attached)

II. Exhibits to be Offered

The Applicants intend to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed on August 10, 2022.
2. Bulk File exhibits including:
 - a. Section 1: Brookfield 2015 Plan of Conservation and Development
 - b. Section 2: Brookfield Zoning Regulations, effective December 21, 2018, last revised January 20, 2021
 - c. Section 3: Brookfield Zoning Map, effective December 21, 2018, last revised January 8, 2019

- d. Section 4: Brookfield Inland Wetlands and Watercourses Regulations, The Inland Wetlands Commission of the Town of Brookfield, Connecticut, adopted June 24, 1974, revised through December 22, 2021
 - e. Section 5: Technical Report
3. Affidavit of Publication of the Legal Notice published in the Danbury News-Times on August 4, 2022 and August 5, 2022.
 4. Applicants' Responses to Siting Council Interrogatories, Set I, dated October 26, 2022.
 5. Applicants' affidavit of sign posting with photographs dated October 26, 2022 (attached).

The Applicants reserve the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as may be necessary during hearing process and on redirect.

III. Remote Public Comment Session Presentation

Robert Burns, P.E. is the designated presenter for the 6:30 p.m. remote public comment session. The Proposed Facility drawings for the presentation drawings will be submitted as a pdf file.

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically and one (1) original and fifteen (15) hard copies were sent overnight mail to the Connecticut Siting Council.

Dated: October 26, 2022

A handwritten signature in blue ink that reads "Lucia Chiochio". The signature is written in a cursive, flowing style.

Lucia Chiochio, Esq.
Daniel Patrick, Esq.
Cuddy & Feder LLP
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White Plains, NY 10601
(914)-761-1300

cc: Homeland
AT&T
APT
C Squared

PAUL H. ZITO

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OBJECTIVE

To provide leadership and technical skills in the design, installation and operation of sophisticated interoperable telecommunication systems.

SUMMARY

- Knowledgeable in system design of complex systems with excellent skills in transforming concepts into working designs.
- Excellent communication skills with strong ability to interact with all levels of management
- Meticulous and exacting work habits with strong supervisory and training skills.
- Computer literate: Working knowledge of software used for RF intermodulation calculations, microwave radio path calculations, radio frequency propagation, database, graphics, word processing, and synchronous communications
- F.C.C. General Class Radio-telephone License #PG-1-66668
- APCO Certified Radio Technician #1-6616

EDUCATION

- State University of New York, Farmingdale, 1972
- AS degree in Electrical Technology
- Erricson GE, EDACS (trunking) training school, 1992
- Motorola Astro (trunking) training school, 2006
- FEMA COML certified, 2009
- FEMA NIMS certified, 2009

EXPERIENCE

Owner of New England Radio Consultants LLC, March 2013 to present.

- Provide consulting services to the public safety community.
- Proven history of vendor neutrality.
- Able to work with a vast variety of manufactures and vendors to deliver quality public safety communications solutions.
- Experienced in project management, system experience and implementation.
- Experienced with simplex and simulcast systems.
- Experienced with analog and digital systems.
- Well versed in TIA R56 grounding standards

Connecticut Public Safety Director of Telecommunications, State of Connecticut Department of Emergency Services and Public Protection, Division of State Police July 2009 to March 2015(retired)

- Responsible for the overall operation of the \$160 million dollar Connecticut Statewide Interoperable Communications systems.
- Responsible for expansion and technology refresh of all systems including conventional, P25 P2 Trunked and analog systems
- Supervised 9 employees and major contractors
- Interfaced with federal agencies on a “need to know” bases

Telecommunications Engineer II, State of Connecticut Department of Public Safety, Division of State Police November 2000 to 2009

Responsible for the supervising and managing of the Motorola and various subcontractors involved in the implementation for the State Police statewide radio system.

- Supervised the Electronic Maintenance Unit. This unit consisted of 2 lead Technicians, 7 Electronic Technicians and 1 secretary.
- Specify and evaluate telecommunications equipment and systems for the Department of Public Safety use.
- Represent the Department of Public Safety to other State, Federal and local entities.

Telecommunications Engineer I, State of Connecticut Department of Public Safety, Division of State Police November 1996 to March 2000

- Responsible for the primary design and writing of the RFP for the State Police statewide radio system.

SIGN POSTING AFFIDAVIT
CONNECTICUT SITING COUNCIL DOCKET NO. 512

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October 22, 2022

I, Jon Longobardi, of Graphix Edge, being duly sworn, deposes and states that:

1. I am over eighteen years of age and I understand the obligations of a statement under oath.
2. On October 19, 2022, I supervised and witnessed the posting of a public notice sign at 60 Vale Road, Brookfield, CT, noticing the Connecticut Siting Council application filing and details of the hearing for Docket No. 512 scheduled on November 3, 2022.
3. The public notice sign measures four (4) feet by eight (8) feet and was posted along Vale Road. The text of the posted sign is as set forth in the Council's Telecommunications Facility Application Guide. Photographs of the signs posted are attached to this affidavit.



Jon Longobardi
Graphix Edge

Subscribed and sworn to before me
this 24th day of October, 2022



Notary Public

My Commission Expires: _____

DAVIA ANNE NAPIERKOWSKI
NOTARY PUBLIC
State of Connecticut
My Commission Expires 12/31/2023





View of public notice sign posted at existing driveway entrance of 60 Vale Road. Photo view is looking north.



View of public notice sign posted at existing driveway entrance of 60 Vale Road. Photo view is looking south.



PUBLIC HEARING

Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T have filed an application with the Connecticut Siting Council (Council) to construct a telecommunications facility at this site, 60 Vale Road, Brookfield, CT. Homeland is proposing to install a 165-foot tower. The Town of Brookfield's public safety equipment will extend above the top of the tower to a height of 191 feet. The Council will hold a remote public hearing on November 3, 2022 via Zoom Conferencing beginning with an evidentiary session at 2:00 p.m., and continuing with a public comment session at 6:30 p.m. A copy of the application can be reviewed at Brookfield Town Hall Offices or on the Council's website: www.ct.gov/csc. For more information, please contact the Council by phone at 860-827-2935, electronically at www.ct.gov/csc, or by mail at 10 Franklin Square, New Britain, CT 06051

10-19-22

View of public notice sign content.